

From: [Baris, Reuben](#)
To: [Eagle, Venus](#); [Laws, Meredith](#)
Subject: pollinator protection language etc
Date: Saturday, August 31, 2013 10:01:18 AM

Meredith and Venus,
Playing catch up here after the OPM training. I've gone through most of the back and forth on the label changes etc. Is this our opportunity to revise all aspects of the labels that come in (pollinator protection inconsistencies, and other identified issues)? That is if they are impacted by the pollinator protection language (foliar neonics, etc.). This has been lingering in the back of my head for some time, thanks for the clarification either of you can provide...
reuben

From: Andrews, Chuck@CDPR [Chuck.Andrews@cdpr.ca.gov]
Sent: Friday, August 30, 2013 11:48 AM
To: Eagle, Venus; jgray@nd.gov; charlie.clark@freshfromflorida.com; steven.dwinell@freshfromflorida.com; rkachadoorian@oda.stat.or.us; jxbrough@gw.dec.state.ny.us
Cc: Laws, Meredith; Rate, Debra; Baris, Reuben; Rosenblatt, Daniel; Prichard, Ann@CDPR; Verder-Carlos, Marylou@CDPR; Alder, Denise@CDPR; Marciano, Donna@CDPR
Subject: RE: Existing Stocks for the products instituting the pollinator protection language

Venus,

We plan to expedite the label changes, although we have seen in the past (fumigant label changes) that some registrants take longer than anticipated to submit labels. This is also compounded when sub-registrants are involved. DPR agrees with the wording changes suggested by NY. We have a concern about the February 2014 date and suggest extending it to at least March 30, 2014. We have some specific questions and comments that you may want to consider.

1) Will the dates on USEPA's acceptance letters change based upon U.S. EPA's approval date? In the email, you state they are prepared to "stamp off" these amendments within 3 months or less. The labels are due the end of September, so that puts the approval of some labels at the end of December 2013. That gives registrants only two months to sell off the old labels in distribution. That doesn't seem a "reasonable time period." If a label isn't approved by USEPA by the end of October, will USEPA change the dates on that registrant's letter to give them more time?

2) Similarly, USEPA draft letter appears to address only those products where registrants are adding the approved pollinator language. USEPA informed us that where there is current bee language on the label that conflicts, those products will be reviewed on a case by case basis. Perhaps these are the products that may take 3 months? In any case, will the compliance dates change if these types of products are not approved by USEPA by the end of October?

3) USEPA only deals with basic registrants, it's likely that DPR will have to work with some of the sub-registrations to get them in compliance. We assume the deadline given to the basic applies to the sub-registrants.

DPR requested a list of registrants/products from USEPA last week. Providing this information will really help us coordinate the effort to approve label changes. We suggested that USEPA sets up a process to inform the States of labels that are accepted to help streamline the process.

Thank you for the opportunity to comment.
Chuck Andrews
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From: Eagle, Venus [<mailto:Eagle.Venus@epa.gov>]

Sent: Thursday, August 29, 2013 9:08 AM

To: jgray@nd.gov; charlie.clark@freshfromflorida.com; steven.dwinell@freshfromflorida.com;
rkachadoorian@oda.stat.or.us; Andrews, Chuck@CDPR; jxbrough@gw.dec.state.ny.us

Cc: Laws, Meredith; Rate, Debra; Baris, Reuben; Rosenblatt, Daniel

Subject: Existing Stocks for the products instituting the pollinator protection language

Hi All,

RD would appreciate your input on reviewing the attached "draft" amendment letter that lays out the existing stock provision for the products affected by the agency's 8/15/13 letter. RD is planning on reviewing (approx. 350 labels) and stamping off in 3 months or less. Some registrants have indicated concern that the States may not be able or willing to review/accept these amended labels by the time their existing stocks run out. What do you think? The agency was hoping to have these labels in place by the 2014 growing season if possible.

Thanks in advance for your input and any further suggestions.

Best

regards,

Venus

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